

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

MOHANRAM VISHNU RAMJATAN /a.k.a/:

MOHANRAM JEWAN

D.O.B: January 27th 1978

SOCIAL SECURITY #: .2123

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

THE CITY GOV'T OF NEW YORK CITY: CITY HALL (CITY COUNCIL), MAYOR, NYC DEP.
NEW YORK STATE GOV'T (ALBANY):
GOVERNOR.

NEW YORK CITY DEPARTMENT OF
ENVIRONMENTAL PROTECTION (NYC-DEP)
Human Resource Dep't 18th Floor, 59-17 Junction
Blvd

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for Employment
Discrimination**

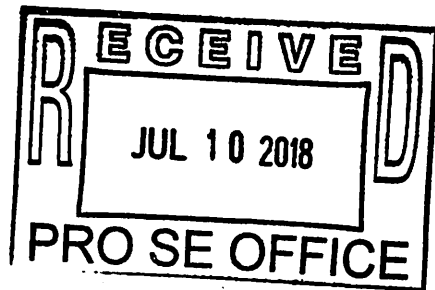
Case No. **CV 18-3936**

(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No
(check one)

CHEN, J.

REYES, M.J.



I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<i>Mohanram Vishnu Ramjatan, / a.k.a/ Jewan</i>
Street Address	<i>14803 111th Avenue</i>
City and County	<i>Jamaica</i>
State and Zip Code	<i>New York, 11435</i>
Telephone Number	<i>347-534-6446</i>
E-mail Address	_____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<i>New York City Dep't of Environmental Protection (NYC DEP)</i>
Job or Title (if known)	<i>Human Resource Management 18th Floor</i>
Street Address	<i>59-17 Junction Blvd, 18th Floor</i>
City and County	<i>Flushing</i>
State and Zip Code	<i>New York, 11373</i>
Telephone Number	<i>(718) 595-3343/ (718) 595-3455</i>
E-mail Address (if known)	_____

Defendant No. 2

Name	<i>The City of New York/ City Hall/ Bill De Blasio</i>
Job or Title (if known)	<i>Mayor of the City of New York</i>
Street Address	<i>City Hall,</i>

City and County *New York, New York*
State and Zip Code *N.Y. 10007*
Telephone Number *212-788-3000*
E-mail Address *FAX: 212-788-9711*
(if known)

Governor Andrew Cuomo
Executive Chambers
STATE Capital Albany
12224

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name *Human Resources Dep't 18th Floor*
Street Address *59-17 Junction Blvd,*
City and County *Flushing*
State and Zip Code *New York, 11373*
Telephone Number *(718) 595-3343/ (718) 595-3455*

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☒ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

- ☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☒ Other federal law (specify the federal law):
The Rehabilitation Act of 1973
- ☐ Relevant state law (specify, if known):

- ☒ Relevant city or county law (specify, if known):
Salary History Questions During Hiring Process are Illegal in NYC:
Effective Oct. 31, 2017.
Employers beware: New York City's new "ban-the-box" law takes effect
this October/ Fair Chance Act (the FCA), which goes into effect on
October 27, 2015.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- ☒ Failure to hire me.
- ☒ Termination of my employment.
- ☒ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.
- ☒ Other acts (specify): ITS JUST ABOUT EVERYTHING.

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
As of present and ongoing since 2003/ 2005 and spreading like cancer (no cure)

C. I believe that defendant(s) (check one):

- ☒ is/are still committing these acts against me.
☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

- ☒ race EAST INDIAN (INDIAN)
☒ color _____
☒ gender/sex _____
☒ religion HINDU - VEDIC
☒ national origin GUYANA SOUTH AMERICA / CARIBBEAN
☒ age. My year of birth is 1978. (Give your year of birth only if you are asserting a claim of age discrimination.)
☒ disability or perceived disability (specify disability)

Diagnosed with a disability: Schizophrenia, Type: Paranoid (admitted to the hospital around August 03rd/04th 2010 and discharged on 24th August 2010 for partial hospital program which lasted for about two (2) Months.

E. The facts of my case are as follows. Attach additional pages if needed.

Denied, deprived employment with various discrimination since 2003-5 to present; several lower job positions or employment within the NYC Dept. of Environmental Protection (NYC-DEP), most of which were pending as I had no knowledge about it and was never informed [cover-ups] as well as in several of New York City-State agencies as commissioner of various city agencies beginning with the NYDEP (since 2008-9), NYPD (2010), especially with the ruling of the Federal Judge: US District Court Judge Shira Scheindlin on August 12th 2013: NYPD's stop and frisk practices. As commissioner for various other city agencies as per laws passed by the city hall-council some of these position were enacted as election proposals one the ballot during local elections for Example: NYC Dep't of Education [The New York Bonds for School Technology Act, Proposal 3 was on the November 4, 2014 ballot in New York] and other agencies as I references in my charge filed with Equal Employment Opportunity (EEOC); copies attached, all these posts/ positons with the Mayor's office, Governor office; New York City-State Gov't were denied, deprived most of all discriminated against (ADA and other federal, city state laws) as a result of theirs and other elected officials lame excuses, negligence and their quest to target, torment, deny, deprive me and

gamble with my life contentiously as those in the NYC-DEP have been doing since 2003. I think that the commissioner of NYC Dept. of Finance position was done with my middle name change with Social Security on November 30th, 2011. I want to believe that the Commissioner of Consumer Affairs got initiated with the notion or assumption that the NYDEP in the previous branch of City Agencies, thus a new job position.

Along with several lower positions within the NYDEP, years back; around 2006-7 I think I noticed a position for the Dep't of Sanitation on my credit report with starting date of the middle name change of issued date on my U.S PASSPORT: January 31st 2005. I assume that only reason it was on the credit report it is because it active positions as I mentioned it, it was covered up. I have no idea where else or which other agency I may have had-have pending job-position with New York City, State Govt.

There have been other city agencies with my new recent last name change: Dep't of Housing, as there could be other agencies, I have no idea what else. These mentioned are what I think is more confident about, for I do not have access to these to records, information, system.

* Please See ATTACHMENTS FOR SUPPORTING INFORMATION

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

JUNE 19th 2018

- B. The Equal Employment Opportunity Commission (check one):

- ☐ has not issued a Notice of Right to Sue letter.
☒ issued a Notice of Right to Sue letter, which I received on (date)

Friday, JUNE 22nd 2018

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (*check one*):

- ☐ 60 days or more have elapsed.
☒ less than 60 days have elapsed.

V. **Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I want my job-position (s); employment, all my civil service time, Retro-active pay since 2003, with all benefits: sick, vacation, compensatory time and other benefits I am/ was/ may entitled to, for I have to apply for and buy back my civil-service time for retirement. I suffered various financial, medical and other damages; most of all numerous financial opportunities and countless employment or career opportunities over these 13 plus years as result of their NEGLIGENCE, WRONGING DOING/ GMBLING ACTION. It was like I never existed since 2003/ 5 with all sorts of insults, being targeted, tormented, gambled with in addition to every area of discrimination. I was denied just everything without any end to it all, family life, all sorts personal freedom, enjoyment, opportunities, etc. I want all general special damages the court could provide. I do believe that I probably There is nothing in this entire universe that I think could justify all of this-I entitles to this entire planet as compensatory-discriminatory payments; over all sorts of punitive, exemplary and other damages in numerous areas or avenues that I may not be knowledge about. I want the court to consider all avenues for damages, compensation, discriminator damages; to the maximum. I want this to be a lesson for everyone and over everything; let there be severe consequences over those responsible or involve as a result of their continuous negligence, wrong-doings corruption, and best what could be violations of their own countless laws, regulation, etc.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 10th, 2018.

Signature of Plaintiff Moharman Vishnu Ramjatan
Printed Name of Plaintiff MOHANRAM VISHNU RAM JATAN / a.k.a /
JEWAN
Moharman Vishnu Jawa